COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Mundet-Hermetite, Inc.
P. O. Box 949
Buena Vista, Virginia 24416
Permit No. VRO80077

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Mundet-Hermetite, Inc. has applied for a renewal of its Title V Operating Permit dated December 15, 1999, for its printing facility in Buena Vista. The Department has reviewed the renewal application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____
Anita C. Riggleman
(540) 574-7852

Air Permit Manager:_____ Date:_____
Sharon G. Foley, P.E.

Deputy Regional Director:_____ Date:_____
Larry M. Simmons, P.E.

FACILITY INFORMATION

Permittee
Mundet-Hermetite, Inc.
P. O. Box 949
Buena Vista, Virginia 24416

Facility
Mundet-Hermetite, Inc.
P. O. Box 949
Buena Vista, Virginia 24416

Plant Identification Number: 51-530-0004

SOURCE DESCRIPTION

SIC 2754 - Commercial Printing, Gravure

Mundet-Hermetite, Inc. uses two (2) rotogravure printing press lines supported by natural gas-fired ovens to print solvent based inks on roll stock cigarette tipping paper.

The facility is a Title V major source of VOCs. This source is located in an attainment area for all pollutants, and is a PSD major source (potential to emit VOCs is greater than 250 tons per year).

According to our files, this source was first permitted for a third printing press line (Reference Number 8) on April 19, 1988. The 1988 permit was issued with emission limits for both existing press lines (P5 and P7) and a proposed press line (Reference Number 8) to avoid applicability of Prevention of Significant Deterioration (PSD) Permitting Regulations. This permit was amended on March 11, 1994 to require calculation of annual emissions on a consecutive 12-month period basis as the result of a requirement of a Consent Order issued on December 7, 1993. On April 22, 1997, a permit was issued which superseded the April 19, 1988 permit and March 11, 1994 amendment. The April 22, 1997 permit (Attachment B) removed conditions pertaining to Press Line Number 8, which was removed from the facility.

COMPLIANCE STATUS

In its application dated February 4, 2004, for Title V permit renewal, Mundet-Hermetite Inc. certified that it is in compliance with all applicable requirements. The facility is inspected annually by DEQ. The most recent full compliance evaluation of this facility, including a site visit, was conducted May 14, 2003, and Mundet-Hermetite Inc. was found to be operating in compliance during the inspection. In addition, all reports and other data required by permit

conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Table I. Significant Emission Units

Emission Unit ID	Stack ID	Emission Unit Description	*Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
Printing Equipment							
P5	A	2-color rotogravure printing press	-	-	-	-	4/22/97
	B	2-color rotogravure printing press	-	-	-	-	4/22/97
	C	2-color rotogravure printing press	-	-	-	-	4/22/97
P7	D	5-color rotogravure printing press	-	-	-	-	4/22/97
	E	5-color rotogravure printing press	-	-	-	-	4/22/97
Paper Trimming Collection System							
01	na	Koger-Air Corp. Size 14 Cyclone	-	-	-	PM/PM-10	na
02	na	Seneca Environmental Products #36/1M/10 Fabric Filter Baghouse	-	-	-	PM/PM-10	na

EMISSIONS INVENTORY

A copy of the 2003 emission inventory is attached as Attachment A. Emissions are summarized in the following tables.

Table II. 2003 Actual Criteria Pollutant Emissions

	Criteria Pollutant Emissions (tons/yr)				
	VOC	CO	SO_2	PM-10	NO_x
Kewanee Natural Gas-Fired Boiler (H2)	<0.5	<0.5	<0.5	<0.5	<0.5
In-Process Natural Gas-Fired Ovens and Aerovent Natural Gas-Fired Air Makeup Units (H3 and H4)	<0.5	<0.5	<0.5	<0.5	0.5
Printing Press Lines (P5 and P7)	372.9	0	0	0	0
Total	**372.9**	**<0.5**	**<0.5**	**<0.5**	**0.5**

Table III. 2003 Actual Hazardous Air Pollutant Emissions

Pollutant (CAS #)
Dibutyl Phthalate (84-74-2)
<0.005 tons/year

CHANGES SINCE INITIAL PERMIT

Changes from the initial Title V permit are:

- Elimination of requirement to keep natural gas purchase records
- Clarification of recordkeeping requirement for operator training on air pollution control equipment (minor NSR Condition 11)
- Update of General Conditions with current boilerplate language
- Replacement of area source language from 40 CFR 63.820(a)(2) with similar language to establish area source status for Mundet by limiting their potential to emit, as allowed by 40 CFR 63.820(a)(7) (resulting in the elimination of Condition III.A.5.)
- Revision of tiered approach to VOC testing requirement

These changes are discussed in more detail below.

PRINTING EQUIPMENT APPLICABLE REQUIREMENTS - P5 and P7

Limitations

The following limitations are state BACT requirements from the minor NSR permit issued on April 22, 1997. Please note that the condition numbers are from the 1997 permit; a copy of the permit is enclosed as Attachment B.

Condition 3: Limit on the type of fuel to be combusted in each printing press dryer. Note that the new source permit also contains a requirement that natural gas is the only approved fuel for the afterburner. The fuel requirement for the afterburner was not included in the Title V permit because the printing line which had the afterburner, Printing Press Line #8, is no longer in service and has been removed from the facility.

Condition 5: Annual and hourly emission limits for VOC from the two printing press lines (P5 and P7).

Condition 11: Written operating procedures and operator training records for air pollution control equipment. There are no add-on air pollution control devices on the printing equipment, but the presses themselves may be considered for this condition. The throughput of the printing presses limits VOC and HAP emissions and the proper operation of the printing presses helps to ensure the visible emission limit.

The following Virginia Administrative Codes that have specific requirements for processes have been determined to be applicable, but have not been included in this section of the permit because the printing equipment does not have the potential to emit the regulated pollutants:

9 VAC 5-40-260, Standard for Particulate Matter (AQCR 1-6)
9 VAC 5-40-280, Standard for Sulfur Dioxide
9 VAC 5-40-290, Standard for Hydrogen Sulfide

The following Virginia Administrative Code has been determined to be applicable:

9 VAC 5-40-80, Existing Source Standard for Visible Emissions

40 CFR 63 Subpart KK establishes emission standards for product rotogravure presses such as those operated by Mundet-Hermetite. Mundet-Hermetite has decided to establish area source status (according to 40 CFR 63.820(a)(7)) by limiting their potential to emit through the statement listed below. They remain an area source as long as they meet the following requirement:

> Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the facility shall not exceed 9.9 tons per year of any individual HAP or 24.9 tons per year of any combination of HAPs, including materials used for source categories or purposes other than printing and publishing, calculated monthly as the sum of each consecutive 12-month period.

This requirement for maintaining area source status is listed in the permit as Condition III.A.4. Because its potential to emit HAPs is limited to below major-source levels, Subpart KK is not applicable to Mundet-Hermetite. In its initial Title V permit, Mundet-Hermetite committed to the usage limits defined in 40 CFR 63.820(a)(2) to establish itself as an area source of HAP subject only to the recordkeeping requirements of 40 CFR 63 Subpart KK. In its renewal application, Mundet-Hermetite requested that area-source status be established instead through a conventional limit on individual and combined HAP emissions (as referenced at 40 CFR 63.820(a)(7)), calculated monthly as a rolling 12-month total. The usage limits in its initial Title V permit have therefore been removed, i.e., Condition III.A.5. has been deleted as well as references to it previously listed in Conditions III.B.4. and III.B.8.

Monitoring and Recordkeeping

The monitoring and recordkeeping requirements in Condition 6 of the NSR permit have been modified to meet Part 70 requirements.

Compliance with the hourly and annual VOC emissions, established in Condition III.A.2., shall be monitored by monthly recordkeeping of the throughput of inks and solvents used, the %

VOC content, and the hours of operation of the printing press lines P5 and P7 (Condition III.B.10.a., b., c., and d.).

The permittee shall determine compliance with the annual VOC emission limit established in Condition III.A.2. by calculating emissions each calendar month as follows:

$$E_{voc} = \sum_{i=1}^{n} M_{voc} W_{voc}$$

Where:

E_{voc}	=	monthly VOC emissions in tons
M_{voc}	=	the total mass (ton) of each solvent or ink during the calendar month
W_{voc}	=	the weight fraction of VOC of each solvent or ink (i)

Annual VOC emissions shall be calculated as the sum of each consecutive 12-month period.

For the purposes of calculating VOC emissions, the permit requires a tiered approach to determining VOC content in ink and solvents. Mundet-Hermetite, Inc. has historically operated at levels below (at approximately 50% of) its emission limits. Because of the large margin of compliance, the permit allows the VOC content of ink as supplied to be based on manufacturer formulation data as shown on the Material Safety Data Sheet (MSDS) for each product. If a range of VOC content values is given, calculations shall be based on the maximum value. However, once the monthly calculation of actual emissions (as required by Condition III.B.1.) indicates that annual VOC emissions from any individual ink, solvent, or other material are equal to or greater than 10% of the allowable annual emissions, quarterly testing of that product formulation is required. The testing shall be determined, by either the permittee or supplier, using EPA Reference Method 24 or 24A (40 CFR 60, Appendix A). Each shipment of subject material must be identified by a product formulation number that may be correlated to Reference Method 24 or 24A results. Emission calculations must be based on the most recent test results for each formulation. The quarterly tests may be discontinued after actual annual emissions from individual subject inks, solvents, or other materials, are below 10% of the allowable levels for three consecutive months. If quarterly testing is discontinued, the permit requires that the VOC content determined in the latest test for each subject formulation be used in lieu of MSDS information.

It should be noted that only a few inks account for the majority of the ink volume used at the facility. There are several inks that are used in very small amounts and represent only a small fraction of the total ink used. Testing inks used in such small quantities would be costly and would not be representative of the inks comprising the majority of the emissions. The tiered approach proposed, therefore, will ensure that VOC content is verified for those inks that appreciably contribute to emissions and will thus provide reasonable assurance of compliance with the emission limit.

The permittee shall determine compliance with the hourly emission limit established in Condition III.A.2. by calculating emissions each calendar month as follows:

$$E_{vochr} = \frac{\sum_{i=1}^{n} M_{voc} W_{voc}}{H}$$

Where:

E_{vochr} = VOC emissions in pounds per hour
M_{voc} = the total mass (lb) of each solvent or ink during the calendar month
W_{voc} = the weight fraction of VOC of each solvent or ink (i)
H = the total monthly hours of operation of press lines P5 and P7 during the calendar month

There is no monitoring required in the renewed permit for the visible emission limit. On May 14, 2003, during the last full compliance evaluation, including a site visit, visible emissions were observed at less than 5% opacity from the press stack and no visible emissions were observed from the paper trim system (vented inside). Historically, stack observations during the annual inspections revealed little or no visible emissions. Due to the absence of visible emissions in the past and the use of natural gas for fuel in the dryers, no visible emissions are anticipated.

Compliance with the HAP limits listed in Condition III.A.4. shall be monitored by monthly recordkeeping of the throughput of inks and solvents used and the % HAP content, as stated in Condition III.B.10.a., b. and e.

Unless otherwise approved by the Director, Valley Region, the permittee shall determine compliance with the individual HAP emission limit established in Condition III.A.4. by assuming HAP emissions are equal to HAP usage and calculating HAP usage each calendar month as follows:

$$E_{hap} = \sum_{i=1}^{n} M_{sol} W_{hap}$$

Where:

E_{hap} = the total individual HAP usage, in tons
M_{sol} = the total mass, in tons, of each solvent or ink during the calendar month
W_{hap} = the weight fraction of each individual HAP contained in each solvent or ink,(i)

Annual individual HAP usage shall be calculated each month as the sum of each consecutive 12-month period.

The permittee shall determine compliance with the combined HAP emission limit established in Condition III.A.4. by assuming HAP emissions are equal to HAP usage and calculating total HAP usage each calendar month as follows:

$$TE_{hap} = \sum_{i=1}^{n} E_{hap}$$

Where:

TE_{hap} = the total HAP usage, in tons

E_{hap} = the total individual HAP, in tons used, during the calendar month

Annual total HAP usage shall be calculated each month as the sum of each consecutive 12-month period.

For the purposes of calculating HAP emissions, the permit requires a tiered approach to determining HAP content in ink and solvents. Mundet-Hermetite, Inc. has historically operated without using inks and solvents containing HAPs. Because of the large margin of compliance, the permit allows the HAP content of inks and solvents as supplied to be based on manufacturer formulation data as shown on the Material Safety Data Sheet (MSDS) for each product. If a range of HAP content values is given, calculations shall be based on the maximum value. However, once the monthly calculation of actual emissions (as required by Conditions III.B.3. and III.B.4.) indicates emissions at 75% or more of the allowable annual HAP emissions, quarterly testing of each product formulation is required. The testing shall be determined, by either the permittee or supplier, using EPA Reference Method 311 (40 CFR 60, Appendix A). Each ink and solvent shipment must be identified by a product formulation number that may be correlated to Reference Method 311 results. Emission calculations must be based on the most recent test results for each formulation. The quarterly tests may be discontinued after actual annual emissions are below 75% of the allowable levels for three consecutive months. If quarterly testing is discontinued, the permit requires that the HAP content determined in the latest test for each formulation be used in lieu of MSDS information.

Testing

Condition 4 of the minor NSR permit, issued on April 22, 1997, is a requirement that the facility be constructed with test ports so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods.

The Title V permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit.

Streamlined Requirements

In the renewal application, Mundet-Hermetite requested a streamlined requirement for several conditions in the Printing Equipment Section. Each request is addressed individually below:

Description	Citation	Reason	Suggested replacement or hybrid requirement
Limit on HAP usage	Title V permit 12/15/99 Conditions III.A.4. & 5.	a) HAP usage is inappropriate, HAP emissions are referred to elsewhere. b) As referred in supplement to page 6, emissions negligible	Limit on HAP emissions not usage

Mundet previously committed to the criteria listed in 40 CFR 63.820(a)(2), which established the facility as an area source by limiting annual usage of HAPs. Mundet has now decided to establish area source status (according to 40 CFR 63.820(a)(7)) by limiting their potential to emit through the statement listed below. They remain an area source as long as they meet the following requirement:

> Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the facility shall not exceed 9.9 tons per year of any individual HAP or 24.9 tons per year of any combination of HAPs, including materials used for source categories or purposes other than printing and publishing, calculated monthly as the sum of each consecutive 12-month period.

This requirement for maintaining area source status is listed in the permit as Condition III.A.4. Condition III.A.5. has been deleted as well as references to it previously listed in Conditions III.B.4. and III.B.8.

Description	Citation	Reason	Suggested replacement or hybrid requirement
Testing if VOC or HAP emissions exceed 75% of allowable limit	Title V permit 12/15/99 Conditions III.B.6. & 8.	Facility uses many different inks, cost of batch testing would not be reasonable. Updated MSDSs list components based on Method 24. Incoming inks are always thinned with solvent to ensure good printing results. Therefore, if inks have a higher percentage of VOC, less solvent would be added. Solvent testing is unnecessary since always = 100% VOC	a) at discretion of DEQ, specific ink batches tested if limits exceeded, b) reference testing to MSDS or c) increase percentage allowed before ink-testing is initiated

This requirement cannot be streamlined. The HAP testing requirement (Condition III.B.8.) was established to satisfy periodic monitoring. This tiered approach is used at several other Title V surface coating facilities and is only triggered if actual HAP emissions approach the area source limit. However, the VOC testing requirement (Condition III.B.6.) was revised to use an alternate tiered approach, which has been accepted for other coating facilities. Once the monthly calculation of actual emissions (as required by Condition III.B.1.) indicates that annual VOC emissions from any individual ink, solvent, or other material are equal to or greater than 10% of the allowable annual emissions, quarterly testing of that product formulation is required. The testing shall be determined, by either the permittee or supplier, using EPA Reference Method 24 or 24A (40 CFR 60, Appendix A). Each shipment of subject material must be identified by a product formulation number that may be correlated to Reference Method 24 or 24A results. Emission calculations must be based on the most recent test results for each formulation. The quarterly tests may be discontinued after actual annual emissions from individual subject inks, solvents, or other materials, are below 10% of the allowable levels for three consecutive months. If quarterly testing is discontinued, the permit requires that the VOC content determined in the latest test for each subject formulation be used in lieu of MSDS information.

Only a few inks account for the majority of the ink volume used at the facility. There are several inks that are used in very small amounts and represent only a small fraction of the total ink used. Testing inks used in such small quantities would be costly and would not be representative of the inks comprising the majority of the emissions. Therefore, this revised tiered approach will ensure that VOC content is verified for those inks that appreciably contribute to emissions and will thus provide reasonable assurance of compliance with the emission limit.

Description	Citation	Reason	Suggested replacement or hybrid requirement
Training records for those working on air pollution controls (baghouse)	Title V permit 12/15/99 Conditions III.B.9.	This is relatively simple piece of machinery. Those working are skilled maintenance persons with many years of experience.	Remove requirement for annual training records

This requirement cannot be streamlined. This condition is included in the NSR permit dated April 22, 1997. The condition in the Title V permit will be modified to clarify that training records are only required for employees working with the air pollution control equipment.

Description	Citation	Reason	Suggested replacement or hybrid requirement
Approved fuel of dryers is natural gas	Title V permit 12/15/99 Conditions III.A.1. & III.B.10.f.	Existing emission units are operated on natural gas. Non-gas fuel would require major modification to units	a) Remove requirement for natural gas or b) confirm that recent gas bills do not have to be available on site (these bills are stored at sister company in Colonial Heights)

The condition designating natural gas as the approved fuel is derived from the 1997 minor NSR permit and is, therefore, an applicable requirement and must be included in the Title V permit. However, the requirement to maintain gas purchase records (Condition III.B.10.f.) may be removed. The press dryers are not designed to use fuel oil and would require modification to accommodate such fuel. Staff review indicates that such a requirement has not been included for gas-fired units in other Title V permits within the region. Therefore, maintaining copies of gas bills will no longer be a requirement.

Description	Citation	Reason	Suggested replacement or hybrid requirement
Visual limitation of 20% opacity	Title V permit 12/15/99 Conditions III.A.3.	Manufacturing process does not have potential to emit visible emissions (there is no oxidizer)	Remove requirement

This requirement cannot be streamlined. This condition is a requirement in the regulations and as such must be listed in Title V permit. All applicable requirements must be listed.

Paper Trimming Collection System Requirements - 01 and 02

Limitations

The following limitations are State BACT requirements from the minor NSR permit issued on April 22, 1997. A copy of the permit is enclosed as Attachment B.

Condition 11: All operators of air pollution control equipment shall be trained to properly operate the equipment.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-80, New Source Standard for Visible Emissions
9 VAC 5-40-260, Existing Source Standard for Particulate Matter (AQCR 1-6)

The permittee will also continue to vent emissions from the paper trimming collection system to inside the facility as required by Condition IV.A.5.

Monitoring and Recordkeeping

The Title V permit requires operation of a fabric filter baghouse for the scrap from the paper trimming operation to demonstrate compliance with the particulate matter and visible emission requirements. A properly operating fabric filter baghouse can achieve compliance with the process weight rate particulate emissions limit.

40 CFR Part 64 *Compliance Assurance Monitoring (CAM) applicability*: During the Title V renewal process, VRO requested that Mundet-Hermetite, Inc. provide calculations showing emissions of particulate matter having aerodynamic diameter less than 10 microns (PM-10) from their scrap collection system, prior to capture in the baghouse. These pre-control emissions were used to determine applicability of the CAM Rule. In a letter dated May 6, 2004, Mundet-Hermetite, Inc. submitted the requested CAM data. Particulate matter was collected over a one-week period. This data was used to calculate the estimated maximum annual emissions for PM-10 based on the maximum number of bobbins of paper the facility could process. The estimated maximum annual PM-10 emissions are 13.10 pounds, or 0.00655 tons, per year. The responsible official for Mundet-Hermetite, Inc. certified the CAM data submission.

Mundet-Hermetite, Inc. does not meet the criteria for CAM applicability because pre-control PTE is 0.00655 tons per year which is well under the Title V major threshold of 100 tons per year. The baghouse on the paper trimming collection system is still subject to the periodic monitoring requirements in 40 CFR Part 70 (Title V).

If the fabric filters are operating properly, compliance with the 20% opacity limit can be achieved since there should be no visible emissions from the units. This is the case because the fabric filters eliminate the particulates, which are the source of the visible emissions. Therefore, if visible emissions are seen from the vent it can be reasonably assumed that there is a problem with the fabric filter. The permittee will inspect the fabric filter baghouse on an annual basis. The inspection will include verification that the fabric filter baghouse remains vented inside the building.

The verification that the fabric filter baghouse remains vented inside the building should demonstrate compliance with the opacity standard (Condition IV.A.2.), the process weight limit (Condition IV.A.4.) and the requirement that emissions from the paper trimming collection system be vented inside the facility (Condition IV.A.5.). The permittee shall maintain inspection records for all observations, VEE results and corrective actions.

The annual inspections will also satisfy the periodic monitoring requirement for the visible emission limitation. The checks for visible emissions will limit malfunctions of the fabric filter baghouse. As long as the fabric filter baghouse is operating properly and vented inside the facility, there is little likelihood of violating the visible emission limitation or the process weight limit.

Compliance with operating according to written operating procedures, Condition IV.A.3. shall be monitored by maintaining records of training provided including names of trainees, date(s) of training and nature of training provided (Condition III.B.9.).

Condition IV.B.3. of this section of the permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include: annual inspection log including the date and time of the inspections, verification that the fabric filter baghouse remains vented inside the building and whether or not there were visible emissions.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing, in addition to the monitoring specified in this permit, is performed pursuant to a request from DEQ. The DEQ and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting in regard to the Paper Trimming and Collection System has been included in the permit.

Streamlined Requirements

In the renewal application, Mundet-Hermetite requested a streamlined requirement for two conditions in the Paper Trimming Collection System Section. This request is addressed below:

Description	Citation	Reason	Suggested replacement or hybrid requirement
Visible emissions < 20% opacity and emissions vented inside	Title V permit 12/15/99 Conditions IV.A.2. & IV.B.2.	During the last 80 inspections, there were no visible emissions and all emissions were vented inside. In the unlikely event of a ruptured bag or malfunctioning relief valve, the PM would be vented into the scrap paper room, not into the atmosphere since there are no roof openings and the building is under negative pressure. Incidentally, Total PM captured is < one-half drum/year	Remove requirement for inspections

Part of this requirement can be streamlined. Condition IV.A.2. (opacity standard) is derived from 9 VAC 5-50-80 and is an applicable requirement and must be included in the Title V permit. Condition IV.B.2. was established to satisfy periodic monitoring that EPA requires for all emission standards including visible emission standards. Considering that the estimated maximum annual PM-10 emissions are 13.10 pounds and that there have been no visible emissions recorded to date, the condition will be streamlined and changed to an annual verification.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within four daytime business hours.

The following sections under General Conditions were updated with current boilerplate language:

- Permit Expiration
- Recordkeeping and Reporting
- Annual Compliance Certification
- Permit Deviation Reporting
- Failure/Malfunction Reporting
- Permit Modification (previously Permit Action for Cause)
- Duty to Pay Permit Fees
- Malfunction as an Affirmative Defense
- Permit Revocation or Termination for Cause
- Asbestos Requirements

STATE-ONLY APPLICABLE REQUIREMENTS

Mundet-Hermetite, Inc. did not identify any state-only enforceable requirements in their renewal application, and all requirements in the minor NSR permit are federally enforceable. Therefore, no state-only applicable requirements have been included in the permit.

FUTURE APPLICABLE REQUIREMENTS

Mundet-Hermetite, Inc. did not identify any future applicable requirements in their application, and DEQ staff is unaware of any requirements that they could become subject to during the life of the Title V permit. Therefore, no future applicable requirements have been included in the permit.

INAPPLICABLE REQUIREMENTS

Mundet-Hermetite, Inc. did identify some inapplicable requirements in their application. The following were the requirements determined to be inapplicable by the DEQ staff:

Citation	Title of Citation	Description of applicability
9 VAC 5-40-3410 thru -3550	Emission Standards for Volatile Organic Compound Storage and Transfer Operations	Applicable to facilities in VOC control (nonattainment) areas. Mundet-Hermetite is not located in a VOC control area.
9 VAC 5-40-5060 thru -5190	Emission Standards for Flexographic, Packaging Rotogravure and Publication Rotogravure Printing Lines	Applicable to facilities in VOC control (nonattainment) areas. Mundet-Hermetite is not located in a VOC control area.
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Applicable to facilities with VOC Storage Vessels with capacities greater than 75 cubic meters or 19,812.9 gallons. The VOC storage tanks at Mundet-Hermetite each have capacities less than 19,812.9 gallons.
9 VAC 5-60-10 thru -110	Hazardous Air Pollutant sources	Applicable to hazardous air pollutant sources for which emission standards are prescribed under 40 CFR Part 63 and incorporated by reference into 9 VAC 5-60-100. Mundet-Hermetite is an area HAP source and is therefore not subject to an emission standard under 40 CFR Part 63.

COMPLIANCE PLAN

Mundet-Hermetite, Inc. is currently in compliance with all applicable requirements. No compliance plan was included in the application or in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Table IV. Insignificant Emission Units

Emission Unit No.	Emission Unit Description	Citation[1] (9 VAC_)	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720 C)
T1	Solvent Storage Tank	9 VAC 5-80-720B	VOC	4000 gallon
T2	Solvent Storage Tank	9 VAC 5-80-720B	VOC	4000 gallon
T3	Solvent Storage Tank	9 VAC 5-80-720B	VOC	4000 gallon
T4	Solvent Storage Tank	9 VAC 5-80-720B	VOC	4000 gallon
PW1	Parts Washing Tank	9 VAC 5-80-720B	VOC	350 gallon
H2	Kewanee Natural Gas-Fired Boiler, Model #LW882	9 VAC 5-80-720C		2.5 MMBtu/hr
H3	In-Process Natural Gas-Fired Ovens	9 VAC 5-80-720C		2.4 MMBtu/hr
H4	Aerovent Natural Gas-Fired Air Makeup Units	9 VAC 5-80-720C		7.5 MMBtu/hr

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

Mundet-Hermetite, Inc. did not submit a request for confidentiality. Therefore, all portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was placed in *The Rockbridge Weekly*, Lexington, Virginia, on November 24, 2004. EPA was sent a copy of the draft permit and notified of the public notice on November 23, 2004. West Virginia, the only affected state, was sent a copy of the public notice in an email dated November 23, 2004. All persons on the Title V mailing list were also sent a copy of the public notice in letters dated November 23, 2004. EPA's 45-day review period ended on January 8, 2005.

No comments were received.

ATTACHMENTS

A. 2003 Emission Inventory

B. Minor New Source Review Permit issued April 22, 1997

ATTACHMENT A

2003 Emission Inventory

ATTACHMENT B

Minor NSR Permit
(dated April 22, 1997)